

1 Kate Muetting, DC Bar No. 988177*
2 Dacey Romberg, DC Bar No. 90003767*
3 Samone Ijoma, MD Bar No. 2012170086*
4 **SANFORD HEISLER SHARP, LLP**
5 700 Pennsylvania Avenue SE, Suite 300
6 Washington, DC 20003
7 Telephone: (202) 499-5206
8 kmuetting@sanfordheisler.com
9 dromberg@sanfordheisler.com
10 sijoma@sanfordheisler.com

11 Charles Field, SBN 189817
12 **SANFORD HEISLER SHARP, LLP**
13 7911 Herschel Avenue, Suite 300
14 La Jolla, CA 92037
15 Telephone: (619) 577-4252
16 cfield@sanfordheisler.com

17 Kristi Stahnke McGregor, GA Bar No. 674012*
18 **SANFORD HEISLER SHARP, LLP**
19 611 Commerce Street, Suite 3100
20 Nashville, TN 37203
21 Telephone: (615) 434-7008
22 kmcggregor@sanfordheisler.com

23 Christopher Owens, MD Bar No. 220280004*
24 **SANFORD HEISLER SHARP, LLP**
25 111 S. Calvert Street, Suite 1950
26 Baltimore, Maryland 21202
27 Telephone: (410) 834-7422
28 cowens@sanfordheisler.com

29 *Attorneys for Plaintiffs
30 and the Potential Class*

31 * admitted *pro hac vice*

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NORTHERN CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 COURTNEY MCMILLIAN and RONALD
12 COOPER, on behalf of themselves and all others
13 similarly situated,

14 Plaintiffs,

15 v.

16 X CORP., f/k/a/ TWITTER, INC.,
17 X HOLDINGS, ELON MUSK, DOES,

18 Defendants.

19 Case No. 3:23-cv-03461-TLT-RMI

20 **DECLARATION OF**
21 **DACEY ROMBERG**

22 Judge: Trina L. Thompson
23 Magistrate Judge: Robert M. Illman

24 **DECLARATION OF DACEY ROMBERG**

25 I, Dacey Romberg, declare as follows:

- 26 1. I am an attorney licensed to practice law in the District of Columbia and am employed by
27 the law firm Sanford Heisler Sharp, LLP. I am an attorney of record for the Plaintiffs in
28 the above-captioned case.
- 29 2. I emailed Defendants' counsel on April 25, 2024, indicating that Defendants' "Rule 7.1
30 Corporate Disclosure Statement and Civil L.R. 3-15 Certification of Conflicts and
31 Interested Entities or Persons" (Dkt. 55) did not comply with Civil Local Rule 3-15(b)(2)

32 Case No. 3:23-cv-03461-TLT-RMI

33 **DECLARATION OF DACEY ROMBERG**

1 because it failed to list the owners of Defendant X Holdings Corp.

2 3. I followed up with Defendants' counsel on April 30, 2024.

3 4. Defendants' counsel responded that Defendants would not be filing a compliant
certification.

5 5. On May 1, 2024, I emailed Defendants' counsel the order from *Anoke v. Twitter*, No. 23-
2217, Dkt. 35 (N.D. Cal. June 6, 2023), requiring Twitter defendants to identify the owners
7 of X Holdings Corp. to comply with Local Rule 3-15. Defendants' counsel did not respond.

8 6. I emailed Defendants' counsel again on May 6, 2024, but they did not respond.

9
10 I declare under penalty of perjury under the laws of the State of California that the foregoing
11 is true and correct. Executed this 6th day of May 2024 in Washington D.C.

12
13 DATED: May 6, 2024

By: /s/ Dacey Romberg

14 Dacey Romberg, DC Bar 90003767
15 (admitted *pro hac vice*)

16 **SANFORD HEISLER SHARP, LLP**
700 Pennsylvania Avenue SE, Suite 300
17 Washington, DC 20003
Telephone: (202) 499-5206
18 dromberg@sanfordheisler.com

19
20 *Attorney for Plaintiffs
and the Potential Class*